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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC.'S AND OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL THEIR PRECIS IN  
SUPPORT OF REQUEST TO FILE  
MOTION IN LIMINE TO EXCLUDE  
TESTIMONY AND OPINIONS OF  
WAYMO EXPERT LAMBERTUS  
HESSELINK OPINION ON TS 25**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc.'s and  
7 Ottomotto LLC's Administrative Motion to File Under Seal Their Precs in Support of Request to File  
8 Motion in Limine to Exclude Testimony and Opinions of Waymo Expert Lambertus Hesselink  
9 Opinion on TS 25 (the "Administrative Motion"). The Administrative Motion seeks an order sealing  
10 highlighted portions of Defendants' Precs in Support of Request to File Motion in Limine ("Uber's  
11 Precs").

12 3. The highlighted portions of Uber's Precs contain or refer to trade secret information,  
13 which Waymo seeks to seal.

14 4. Uber's Precs (green and blue highlighted portions as well as images contained within  
15 green and blue boxes) contains, references, and/or describes Waymo's asserted trade secrets, including  
16 as misappropriated by Defendants, or information that, from context, tends to disclose Waymo's  
17 asserted secrets. The information Waymo seeks to seal includes the confidential design and  
18 functionality of Waymo's proprietary autonomous vehicle system, including its technical  
19 specifications and/or LiDAR designs, which Waymo maintains as secret. I understand that these trade  
20 secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to  
21 Waymo's business (Dkt. 25-31). The public disclosure of this information would give Waymo's  
22 competitors access to descriptions of the functionality or features of Waymo's autonomous vehicle  
23 system. If such information were made public, I understand that Waymo's competitive standing  
24 would be significantly harmed.

25 5. Waymo's request to seal is narrowly tailored to those portions of Uber's Precs that  
26 merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on November 14, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC  
7

8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
10 document has been obtained from Felipe Corredor.  
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12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven  
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